

*Island Mail & More, Inc.**Tel 941-778-1911 ~ 3230 East Bay Drive ~ Holmes Beach, Florida 34221 ~ Fax 941-778-2493*

To: Postal Regulatory Commission, Washington, DC 20268-0001
Comments re: Docket No. MC2012-26
Date: August 6, 2012

As the owner of a small Mail and Parcel business and as a USPS Approved Shipper located in Holmes Beach, Florida, I believe that the USPS "Enhancements to PO Box Service" in MC2012-26 will create a conflict of interest as well as a huge problem for my business - which has been a CMRA (Commercial Mail Receiving Agency) for ten years - as well as for thousands of other small businesses like mine across the country – potentially doing significant damage to an entire industry.

Please note that those of us in the mail and parcel industry who act as CMRAs have agreements with the USPS and we follow USPS regulations as required, acting both at the behest of the USPS as well as in cooperation with that agency. Additionally, we purchase services and postage from USPS. So we have an unusual relationship with USPS in that they are our regulators, our suppliers, and our partners – but they are also, to a certain extent, our competition – competitors who have the upper hand with regard to most postal services.

One advantage we have had in this situation has been our ability to provide some additional services that the USPS does not provide – such as the rental of mailboxes that include a street address and the ability to accept packages from other carriers for our mailbox customers. We also include personal services, such as notification of mail received for our customers, and mail forwarding service when our customers travel.

The new service now being considered by the USPS will put us at a definite disadvantage, since it will offer those additional personal services that it had not previously offered, even in defiance of its own regulations (such as providing a street address rather than a PO Box address) and will provide unfair competition to our industry, in that the USPS can provide services at lower costs than we can (i.e., mail forwarding, wherein we must pay retail postage rates and the USPS can forward mail at no additional charge.) This very much seems to be a vehicle for the USPS to take unfair advantage of what little competition they have, since most people *not* requiring those extra services already prefer to rent boxes at the USPS (because they are priced lower than we can afford to charge).

Our former local Postmaster (now retired) had always considered our business as "an extension" of his post office, providing certain services they could not, as well as relieving some of the congestion in the Post Office, making it easier for them to provide better service for their customers. We had an excellent working relationship. The postmasters who have followed him have, unfortunately, not had that same attitude, and it appears that the USPS does not see us as a benefit, either.

As a CMRA for the US Postal Service, we must strictly follow a set of regulations for proper administration of mail receiving services. These include the requirement for proper identification of those receiving mail, quarterly reports to the local Postmaster to list all authorized persons who receive mail, strict addressing requirements, reporting of terminated mailbox holders, and handling of mail after the termination of services. We have a very detailed Mailbox Services Agreement which includes all the proper information, outlining to our customers what can be done and what cannot. We cooperate with the US Postal Service in working to prevent fraudulent mail practices and to stop those persons who might be involved in trying to rent a box for fraudulent purposes.

But the proposed “Enhancements” would change that, to allow PO Boxes to be used much like those of a CMRA, and at the same time, maintain regulations that prevent CMRAs from acting more like a PO Box. Add to that the fact that our customer lists and contact information are required to be given to the US Postal Service, and there is no way to prevent the US Postal Service from using these lists, if they so desired, to directly recruit our customers to convert to their services instead. We cannot compete with USPS in return – certainly they don’t provide us their lists of PO Box holders!

If passed, the proposed “Enhancements” would erode the partnership relationship, and will put many CMRA locations out of business - or at the least cause significant financial hardship. Additionally, the proposed services would add considerable expense to the USPS budget, including processing and record-keeping costs and additional personnel - costs which might well not be recouped. This could eventually lead to greater debt for the Postal Service.

CMRA locations support and complement the local post offices in offering postal products and services, and loss of these locations will end up hurting the communities that they serve.

I ask that the PO Box Enhancements be rejected, and that efforts to allow for cooperation and fair and level competition between CMRAs and the US Postal Service be increased.

Sincerely,

Sue Normand, President
Island Mail & More

www.islandmailandmore.com